

AB:FJN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 1001(a)(2))

MOLISSA GANGAPERSAD,

18-M-1192

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

STEVEN SCHILIRO, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about December 8, 2018, within the Eastern District of New York, the defendant MOLISSA GANGAPERSAD did knowingly and willfully make materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States to wit: a statement to agents of the FBI, in that the defendant falsely stated and represented that she had not witnessed the shooting of an FBI agent, when, in fact, the defendant then and there knew and believed, she had witnessed the shooting.

(Title 18, United States Code, Section 1001(a)(2)).

The source of your deponent’s information and belief are as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since 2009. I have been involved in the investigation of numerous cases involving violent crimes and the use of firearms. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of documents, conversations I have had with others about this matter, and my training and experience. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not described all of the relevant facts and circumstances of which I am aware.

2. On or about December 8, 2018, a Special Agent of the FBI (the “FBI Agent”) was on duty in Canarsie in Brooklyn, New York. At approximately 3:20 p.m., the FBI Agent was parked in an unmarked car on Canarsie Road, which is a one-way street. As the FBI Agent sat in his parked car, he encountered a dark-colored BMW M5 sedan (the “BMW”) driving down Canarsie Road in the wrong direction.

3. According to surveillance video recovered from the scene, the driver of the BMW, Ronell Watson (“Watson”), parked the BMW near the front of the FBI Agent’s car, partially obstructing the FBI Agent’s ability to drive forward.¹ Watson then exited the BMW and approached the driver side door of the FBI Agent’s car with one hand inside the front pocket of his hooded sweatshirt. The FBI Agent then began to maneuver his car around the BMW. As he did so, Watson pulled out a firearm and began firing at the FBI Agent as the FBI Agent drove away. The FBI Agent was hit by at least one round and suffered a

¹ The investigation revealed that GANGAPERSAD is in a romantic relationship with Watson and that they live together.

gunshot wound to his torso. The FBI Agent then exited his car, drew his firearm, and returned fire at Watson who was standing near the BMW. The FBI Agent struck the BMW with multiple rounds and struck Watson with at least one round. Watson then fled the scene in the BMW. The FBI Agent then returned to his car and called for assistance.

4. According to surveillance video recovered from the scene, defendant MOLISSA GANGAPERSAD was standing on her front porch, which is adjacent to the shooting location, prior to and during the shooting. GANGAPERSAD was in a position to view the shooting as her view was not obstructed in any way. GANGAPERSAD also appeared to be speaking into a cellular telephone prior to the shooting.

5. Later that day, Watson was arrested for the attempted murder of the FBI Agent. FBI agents went to GANGAPERSAD's and Watson's shared residence and GANGAPERSAD agreed to a voluntary interview. At the beginning of the interview, FBI agents told GANGAPERSAD that lying to them was a crime. During the interview, GANGAPERSAD falsely told agents that she had not witnessed the shooting described above and claimed not to know anything about it. After being confronted with surveillance video showing that GANGAPERSAD was on her front porch and in a position to have viewed the shooting, GANGAPERSAD admitted that she had, in fact, witnessed the shooting.

WHEREFORE, your deponent respectfully requests that the defendant
MOLISSA GANGAPERSAD be dealt with according to law.

Dated: Brooklyn, New York
December 10, 2018



STEVEN SCHILIRO
Special Agent
Federal Bureau of Investigation

Sworn to before me this
10th Day of December, 2018

THE HONORABLE STEVEN L. TISCIONE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK